



ITS TELECOMMUNICATIONS SYSTEMS, INC.

15925 SW Warfield Blvd. • P.O. Box 397 • Indiantown, Florida 34956

772-597-2111 • www.itstelecom.net

June 28, 2017

REDACTED

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: WC Docket No. 14-58
ITS Telecommunications Systems, Inc. 2019 Federal ETC Filing (FCC Form 481)

Dear Ms. Dortch:

ITS Telecommunications Systems, Inc. respectfully files confidential and redacted versions of the FCC Form 481 ETC annual reporting information in compliance with the ETC Annual Reports and Certifications in WC Docket 14-58 and pursuant to 47 C.F.R. §54.313 and §54.422 of the Commission's rules.

Pursuant to 47 C.F.R. §0.457 and §0.459 of the FCC Rules, ITS Telecommunications Systems, Inc. is requesting that the FCC Form 481 and attachments be considered proprietary confidential business information due to the competition in our service area.

Enclosed please find one original marked Confidential and one copy marked Confidential and one copy marked Redacted of the FCC Form 481. The redacted version is also being filed this date via the FCC's Electronic Comment Filing System.

Please contact Donna Marreel at donnam@itstelecom.net if there are any questions.

Sincerely,

Bruce Russell
Chief Financial Officer

Enclosures

Serving our community for over 50 years.

Local & Long Distance Phone Services

High Speed Internet

DirecTV

Computer Service & Repair

FCC Form 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
<010> Study Area Code	210331	
<015> Study Area Name	ITS TELECOMM. SYS.	
<020> Program Year	2019	
<030> Contact Name: Person USAC should contact with questions about this data	Donna Marreel	
<035> Contact Telephone Number: Number of the person identified in data line <030>	7725973161 ext.	
<039> Contact Email Address: Email of the person identified in data line <030>	donnam@itstelecom.net	
Form Type	54.313 and 54.422	

**(600) Functionality in Emergency Situations
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0988/OMB Control No. 3060-0819

July 2018

<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOMM. SYS.
<020> Program Year	2019
<030> Contact Name - Person USAC should contact regarding this data	Donna Harreel
<035> Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	donna81tatelecom.net
<600> Certify compliance regarding ability to function in emergency situations	Yes
<810> Descriptive document for Functionality in Emergency Situations	210331f1610 .pdf

Functionality in Emergency Situations

ITS Telecommunications Systems, Inc., DBA, ITS Telecom, certifies that our company is compliant in emergency situations as set forth in the Code of Federal Regulations. We have a Disaster and Hurricane Preparedness Plan in place and update it periodically as needed. ITS Telecom has employees that attend yearly emergency scenario training sessions with both the Florida State Emergency Operations Department and the County Emergency Operations Department. There are ongoing communications with these Emergency Operations Departments when potential emergencies are identified. We have an IT Steering Committee that meets several times a year to review our Emergency Preparedness Policies.

ITS Telecom's central office is designed to withstand power failures through the use of batteries and backup generators. We also have backup generators for our remotes which will keep running until commercial power is restored as long as fuel is available. The IT Department and the Outside Plant Department perform scheduled routine maintenance of our batteries and generators. Our IT Department monitors our network 24/7/365 which ensures timely responses when a problem arises. Our serving area has network redundancy that provides an alternate route when needed.

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018

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<035>	Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	donnam@itstelecom.net
<810>	Reporting Carrier	ITS Telecommunications Systems, Inc.
<811>	Holding Company	Postco, Inc.
<812>	Operating Company	ITS Telecommunications Systems, Inc.

[illegible]

(900) Tribal Lands Reporting
 Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2018

<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOMM. SYS.
<020> Program Year	2019
<030> Contact Name - Person USAC should contact regarding this data	Donna Marreel
<035> Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	donna@itstelecom.net

<900> Does the filing entity offer tribal land services? (Y/N)

No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(5) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1000) Voice and Broadband Service Rate Comparability
Data Collection Form

ROC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010>	Study Area Code	210331
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<039>	Contact Email Address - Email Address of person identified in data line <030>	donna@itstelecom.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 210331f11010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 210331f11030 .pdf

Name of Attached Document

Voice Services Rate Comparability Certification

ITS Telecommunications Systems, Inc. hereby certifies that the price of our fixed residential voice service of \$23.00, effective July 1, 2018, is below the two standard deviations above the national average urban rate of \$45.38 as required in 47 C.F.R. § 54.313(a)(10).

Broadband Comparability Certification

ITS Telecommunications Systems, Inc. hereby certifies that the rates of our fixed broadband for the download speeds of 10 Mbps and 25 Mbps with the upload speeds of 1 Mbps and 5 Mbps do not exceed the benchmark rates as required in 47 C.F.R. § 54.313(g).

REDACTED

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
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July 2018

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<039>	Contact Email Address - Email Address of person identified in data line <030>	donna@its telecom.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<1140> Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.

REDACTED

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

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<039>	Contact Email Address - Email Address of person identified in data line <030>	donna@itstelecom.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP www.itnfiber.com/

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

REDACTED(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481

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<039>	Contact Email Address - Email Address of person identified in data line <030>	donnam@itstelecom.net

CAF BLS Reporting

(3008A)	Please indicate whether new locations were deployed during the prior calendar year.	(Yes/No)	Yes
(3008B)	Please enter the number of new locations deployed in the prior calendar year associated with each of the following speed tiers.		
(3008B1)	Number of newly built locations with access to broadband speeds of at least 10/1 Mbps but less than 25/3 Mbps.		0
(3008B2)	Number of newly built locations with access to broadband speeds of 25/3 Mbps or higher.		140
(3008C)	Please provide the percentage of deployment across the entire study area.		81

(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

(3010B) Please Provide Attachment

Name of Attached Document Listing Required Information

210331f13010B .pdf

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}

(3012B) Please Provide Attachment

No - No New Community Anchors

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}

(Yes/No)

☒ ☐

(3014) If yes, does your company file the RUS annual report

(Yes/No)

☒ ☐

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

210331FL3017.pdf

Certification of Public Interest Obligations

ITS Telecommunications Systems, Inc. hereby certifies that we have been able to provide speeds of at least 4Mbps down/1Mbps up for a majority of our broadband service subscribers. ITS Telecommunications Systems, Inc.'s provides broadband speeds of 10Mbps down/1Mbps up and higher to 81% of the units in our service area.

As an update to last year's narration, ITS Telecommunications Systems, Inc. continued their construction on Fox Brown Road to include the remaining thirty-four (34) locations for a total of eighty-four (84) locations. There was another seven customers who signed up for service, with 14 of these locations subscribing to speeds of 500 Mbps symmetrical bandwidth and the others are using the 200 Mbps symmetrical bandwidth.

Since May, 2016, ITS Telecommunications Systems, Inc. has completed Minute Maid Road which had thirteen (13) locations. The company started a new project in 2017 which when completed will have one hundred and eight (108) lots and all of them will have fiber-to-the-home. With this in mind, ITS Telecommunications Systems, Inc. will be able to provide bandwidth speeds up to 1 Gigabit symmetrical. We completed building fiber to forty-three (43) lots for this project at the end of 2017.

REDACTED – FOR PUBLIC INSPECTION
ITS TELECOMMUNICATIONS SYSTEMS, INC.

ATTACHMENT LINE 3015-16

FINANCIAL REPORTS
PURSUANT TO 47 C.F.R § 54.313

ATTACHMENT REDACTED IN ENTIRETY

(3005) Rate Of Return Office Additional Documentation (Continued)

Data Collection Form

FCC Form 481

OMB Control No. 3000-0000 OMB Control No. 3000-0019

July 2018

<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOM. SYS.
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<030> Contact Name - Person USAC should contact regarding this data	Donna Marreel
<035> Contact Telephone Number - Number of person identified in data line <030>	72593161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	donna@its telecom.net

Financial Data Summary

(3027) Revenue	[REDACTED]
(3028) Operating Expenses	[REDACTED]
(3029) Net Income	[REDACTED]
(3030) Telephone Plant In Service (TPIS)	[REDACTED]
(3031) Total Assets	[REDACTED]
(3032) Total Debt	[REDACTED]
(3033) Total Equity	[REDACTED]
(3034) Dividends	0

Name of Attached Document Using Required Information

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is xxx. The time required to complete this information collection is estimated to average x hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

USDA-RUS FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS	This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.	
	BORROWER NAME ITS Telecommunications Systems, Inc.	
	ADDRESS Indiantown, Florida	
INSTRUCTIONS-Submit report to RUS within 15 days after close of the period.	PERIOD ENDING December, 2017	BORROWER DESIGNATION FL1103

CERTIFICATION

We hereby certify that:

1. the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief; and
2. we have fulfilled our obligations under the Loan Documents throughout the year in all material respects

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

☐ All of the obligations under the RUS loan documents have been fulfilled in all material respects.

☒ There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the notes section of this report.

Jeffrey Leslie

06/05/2018

DATE

PART A. BALANCE SHEET

ASSETS	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE END OF PERIOD
CURRENT ASSETS		CURRENT LIABILITIES	
1. Cash and Equivalents		16. Accounts Payable	
2. Cash-RUS Construction Fund		17. Notes Payable	
3. Accounts Receivable		18. Current Mat. L/T Debt - RLIS	
4. Notes Receivable		19. Current Mat. UT Debt-Other	
5. Materials and Inventory		20. Current Mat.-Capital Leases	
6. Other Current Assets		21. Other Current Liabilities	
Total Current		Total Current	
7. Assets (1 thru 6)		22. Liabilities (16 thru 21)	
NONCURRENT ASSETS		LONG-TERM DEBT	
8. Investment in Affiliated Companies		23. Funded Debt-RUS Notes	
9. Other Noncurrent Assets		24. Funded Debt-RTB Notes	
PLANT, PROPERTY, AND EQUIPMENT		25. Funded Debt-FFB Notes	
10. Telecom. Plant-in-Service		26. Funded Debt-Other	
		Total Long-Term	
		27. Debt (23 thru 26)	
11. Plant Under Construction		OTHER LIAB. & DEF. CREDITS	
12. Plant Adj., Nonop. Plant, & Goodwill		28. Other Long-Term Liabilities	
13. Less Accumulated Depreciation		EQUITY	
Net Plant		29. Cap. Stock Outstand. & Subscribed	
14. (10 thru 12 less 13)		30. Additional Paid-in-Capital	
		31. Membership and Cap. Certificates	
		32. Patronage Capital Credits	
		33. Retained Earnings or Margins	
		34. Total Equity (29 thru 34)	
TOTAL ASSETS		TOTAL LIABILITIES AND	
15. (7+8+9+14)		35. EQUITY (22+27+28+34)	

Total Equity = % of Total Assets

USDA-RUS FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS		BORROWER DESIGNATION FL1103 PERIOD ENDING December, 2017
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS		
ITEM	YEAR-TO-DATE	
1. Local Network Services Revenues		
a. Voice		
b. Video		
c. Internet		
i. Broadband		
ii. Other		
2. Network Access Services and Long Distance Revenues		
3. Miscellaneous Revenues		
4. Other Operating Income		
5. Uncollectible Revenues		
6. Net Operating Revenues (11 thru 4 less 5)		
7. Plant Specific Operations Expense		
8. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)		
9. Customer Operations Expense		
10. Corporate Operations Expense		
11. Other Operating Expenses		
12. Total Operating Expenses (7 thru 11)		
13. Operating Income or Margins (6 less 12)		
14. Nonoperating/Nonregulated Net Income		
15. EBITDA (13 + 14)		
16. Depreciation Expense		
17. Amortization Expense		
18. EBIT (15 - 16 - 17)		
19. Interest on Funded Debt		
20. Other Interest Expense		
21. Taxes		
a. Property		
b. Income		
22. Total Net Income or Margins (18-19-20-21)		
23 Dividends Declared (Common)		
24 Dividends Paid		
25 Transfers to Patronage Capital		
26 Principal Payments on Long Term Debt and Capital Leases		
27 TIER (19 + 20 + 22) / (19 + 20)		

USDA-RUS				BORROWER DESIGNATION		
FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS				FL1103		
				PERIOD ENDING December, 2017		
PART C. SERVICES						
		1. RATES		2. SUBSCRIBERS		
		Residential	Business	Residential	Business	Total
No.	SERVICE OFFERINGS	(a)	(b)	(a)	(b)	(c)
	Broadband Data Packages					
1	256K					
2	768K					
3	SYMMETRIC GIGABIT					
4	50M					
5	16M					
6	100m					
7	SYMMETRIC 50/50					
8	15M					
9	30M					
10	3M					
11	SYMMETRIC 25/25					
12	SYMMETRIC 200/200					
13	12M					
14	SYMMETRIC 10/10					
15	SYMMETRIC 500/500					
16	60M					
17	6.1M					
18	1M					
19	10M					
20	6M					
21	Symmetric 100/100					
22	25M					

USDA-RUS				BORROWER DESIGNATION	
FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS				FL1103	
				PERIOD ENDING	
				December, 2017	
PART C. COMMUNITIES					
No.	Community	County	State	No.Broadband Data Customers	Broadband Application
1	Indiantown CDP	Martin	FL		X

USDA-RUS		BORROWER DESIGNATION
FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS		FL1103
		PERIOD ENDING
		December, 2017
PART D. STATEMENT OF CASH FLOWS		
1.	Beginning Cash	
CASH FLOWS FROM OPERATING ACTIVITIES:		
2.	Net Income	
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>		
3.	Add: Depreciation	
4.	Add: Amortization	
5.	Other (Explain) Adjustment to reconcile to Accounts Receivable and Inventory balances.	
<i>Changes in Operating Assets and Liabilities:</i>		
6.	Decrease/(Increase) in Accounts Receivable	
7.	Decrease/(Increase) in Materials and Inventory	
8.	Decrease/(Increase) in Other Current Assets	
9.	Increase/(Decrease) in Accounts Payable	
10.	Increase/(Decrease) in Other Current Liabilities	
11.	Net Cash Provided/(Used) by Operations	
CASH FLOWS FROM FINANCING ACTIVITIES:		
12.	Decrease/(Increase) in Notes Receivable	0
13.	Increase/(Decrease) in Notes Payable	0
14.	Plus/(Less) Net Increase/(Decrease) in Long Term Debt (including current maturities)	
15.	Plus: Increase/(Less: Decrease) in Capital Stock, Paid-in Capital or Membership and Capital Certificates	0
16.	Less: Payment of Dividends	
17.	Other (Explain)	
18.	Net Cash Provided/ (Used) by Financing Activities	
CASH FLOWS FROM INVESTING ACTIVITIES:		
19.	Net Capital Expenditures	
20.	Long-Term Investments	
21.	Other (Explain) Other changes in assets not covered in cash flow items listed here.	
22.	Net Cash Provided (Used) by Investing Activities	
23.	Net Increase/ (Decrease) in Cash	
24.	Ending Cash	

REDACTED

USDA-RUS

FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS

BORROWER DESIGNATION

FL1103

PERIOD ENDING

December, 2017

Notes to Operating Report - Broadband

[REDACTED]

Attachments

REDACTED

(800) Operating Companies
Data Collection Form

FOC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

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[illegible]

Certification - Reporting Carrier Data Collection Form	FOC Form 481 OMB Control No. 3060-0988/ OMB Control No. 3060-0819 July 2018
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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF.

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or U Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	ITS TELECOMM. SYS.
Signature of Authorized Officer:	<i>Bruce Russell</i> Date 6/29/18
Printed name of Authorized Officer:	Bruce Russell
Title or position of Authorized Officer:	Chief Financial Officer
Telephone number of Authorized Officer:	772597406
Study Area Code of Reporting Carrier:	210331 Filing Due Date for this form: 07/02/2018
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	